

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

MICHAEL W. INGRAM,

Plaintiff,

v.

**DARON HALL, SHERIFF; AUSTIN BODIE,
ADMINISTRATOR; ABL FOOD
SERVICE, INC.; JERRY MATHES,
FOOD SERVICE DIRECTOR; V. DULIN,
FOOD SERVICE DIRECTOR; SGT. BARNES,
DAVIDSON COUNTY SHERIFF'S OFFICE;
SGT. FREEMAN, DAVIDSON COUNTY
SHERIFF'S OFFICE; SGT. McCUTCHEON,
DAVIDSON COUNTY SHERIFF'S OFFICE,**

Defendants.

Civil Action No. 3:09-CV-00037

MAGISTRATE KNOWLES

AFFIDAVIT OF RICHARD B. McLAREN

Richard B. McLaren, after being duly sworn in accordance with the law, deposes and testifies as follows:

1. I am a resident of Baton Rouge, Louisiana. I am an adult over eighteen (18) years of age. The matters in this Affidavit are made of my personal knowledge. They are facts and opinions which I believe would be admissible in evidence and I affirmatively state that I am competent to testify to the matters contained herein.

2. From August 14, 2006 to the present, I have served as the Director of Human Resources for ABL Management, Inc. In that role, I have knowledge of the business activities of the corporate officers of ABL Management, Inc.

3. ABL Management, Inc. is contracted to provide food to inmates at the CJC in Nashville, Tennessee. ABL Management, Inc. is a Louisiana corporation that is authorized to

conduct business in the State of Tennessee. Its principal office is located in Baton Rouge, Louisiana.

4. I have never had any direct contact with Michael Ingram, the Plaintiff in this matter. No corporate officers of ABL Management, Inc. have ever had any direct contact with Michael Ingram, the Plaintiff in this matter.

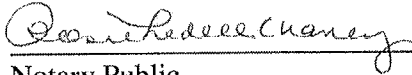
FURTHER, DEPONENT SAITH NOT.



RICHARD B. McLAREN

STATE OF LOUISIANA)
PARISH OF EAST BATON ROUGE)

On this 21st day of SEPTEMBER, 2009, personally appeared Richard B. McLaren to me known to be the person described in the foregoing Affidavit and the person who executed the foregoing Affidavit and acknowledged that he executed the same of his free act and deed after taking an oath.



Notary Public

My Commission Expires: at death